

From: [Lisa B. Shelkrot](#)
To: [Ian Carleton](#)
Cc: [Emily J. Joselson](#)
Subject: Re: Burlington School District v. Bayer/Monsanto
Date: Friday, November 11, 2022 5:08:41 PM

Hi Ian,
Thanks for getting in touch. The district is well aware of the need to avoid spoliation, but we'd be happy to discuss timing issues. If you and I don't connect Monday, I'm copying Emily Joselson, who is also working on the matter.

On Nov 11, 2022, at 4:12 PM, Ian Carleton <icarleton@sheeheyvt.com> wrote:

Hi Lisa,

I'd like to connect on Monday about the Burlington High School PCB litigation, if Langrock has in fact been engaged to represent the school district. We're in for Bayer. Media reports this week indicate the school district intends to proceed with demolition as soon as January. We're concerned that doesn't allow enough time for proper inspection of the high school in connection with the Rubman litigation that has already been filed, or the school district litigation that is described in the media as forthcoming. I'd like to discuss the timing of inspections relative to demolition with you as soon as possible. Obviously we need to avoid spoliation.

I'd also like to confirm you'll accept service of subpoenas on behalf of the school district. Our goal is to have those ready next week as well.

Hope you have a great time in New York. Talk soon. Thanks.

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EXHIBIT B
